

DRAFT EXECUTIVE SUMMARY

GRAND AVENUE NORTHWEST CORRIDOR STUDY SR 303L to SR 101L

Prepared for



November 2002

***Grand Avenue
Northwest Corridor Study
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Draft Executive Summary

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Prepared by



In association with BRW and A DYE DESIGN

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EXECUTIVE SUMMARY

The Grand Avenue Northwest Corridor Study encompasses an 11.5-mile segment on US 60 (Grand Avenue) between SR 303L and SR 101L. This roadway passes through the cities of Surprise and Peoria, towns of El Mirage and Youngtown, and the unincorporated communities of Sun City West and Sun City. This roadway is one of the primary urban arterials serving these communities and is also a vital link in the statewide highway system. This portion of US 60 serves primarily as the continuation of US 93, which links the Phoenix metropolitan area to Las Vegas, Nevada, and I-15. US 93 terminates in Wickenburg approximately 20 miles northwest of the study corridor.

The purpose of this study is to determine the long-term needs of the highway corridor and to establish a plan for meeting these needs. Although the primary focus of the study is on highway needs, consideration was also given to transit, pedestrians, bicyclists, electric carts, and special needs of the elderly and physically challenged. Eight working papers were prepared during the study and were posted on the Maricopa Association of Governments (MAG) web site for review by stakeholders and the general public.

Several agency/community forums were held to bring together the primary stakeholders in the corridor. These forums were held five times during the course of the study to review study products and to provide input to the corridor needs identification and to the selection of preferred solutions. Representatives attended the forums from all the communities identified above, plus the Regional Public Transportation Authority (RPTA), Arizona Department of Transportation (ADOT), Maricopa County Department of Transportation (MCDOT), Federal Highway Administration (FHWA), Burlington Northern Santa Fe Railroad Company (BNSF), and other cities and towns in the MAG Region. The unincorporated communities were represented by their respective homeowner associations. Two public meetings were held and were well attended. Separate meetings were held with some of the stakeholder groups upon request including Sun City West Property Owners and Residents Association, Sun City Home Owners Association, Sun City Grand Coalition, SunHealth Systems, and development interests.

HISTORY

US 60 historically served as the primary route between the Phoenix and Los Angeles areas. This function was moved to I-10 when it was completed in the late 1980's. In the meantime, extraordinary growth occurred in the study area beginning with the original Del Webb Sun City in the early 1960's. Subsequently, Sun City West was built and more recently the City of Surprise has become one of the fastest growing communities in the Greater Phoenix Area due in part to the development of Sun City Grand within the city limits. Most of these large development communities cater primarily to adult/senior citizens; however, more recent developments are designed for the broader population. The large development communities have generally been designed to limit arterial traffic passing through the development. As a result, the arterial grid in the area is very limited which forces more traffic and multiple functions on the two through arterials – Grand Avenue and Bell Road. Both streets serve through traffic, community arterial traffic, and access to abutting commercial land uses. Consequently, the roadways do not provide good service to any one of these functions.

In the mid-1980's, ADOT conducted a study of Grand Avenue from what is now SR 303L to Van Buren Street near Downtown Phoenix. The study recommended construction of a grade-separated expressway for the entire 26-mile distance. Subsequently, a connection between Grand Avenue and I-17 where the two roads cross was deemed to be not possible. In 1994, the planned Paradise Freeway, which would have provided a linkage from Grand Avenue to I-17 and to SR 51, was removed from the planned highway system. This action eliminated any potential direct linkage between the planned Grand Avenue Expressway and other freeways/expressways in the central portion of the urban area.

In 1998, a new corridor study of Grand Avenue was completed by MAG. Again, the entire 26-mile section was considered, but it was determined that the primary focus should be on the portion southeast of SR 101L where the six-legged intersections exist and train activity on the railroad creates more conflicts with highway traffic. Based on local community input, no recommendations were made in that study for the northwest portion of Grand Avenue.

The MAG Corridor Study was followed by a Major Investment Study conducted by ADOT for the portion of Grand Avenue between SR 101L and I-17. The results of this study were the selection of eight grade separation projects to eliminate the six-legged intersections and to provide additional grade separations with the BNSF. Two of these grade separations are under construction, two are programmed for construction in 2003, and four are in the final engineering design phase. All eight are programmed to be completed in 2006.

Although some additional improvements may be made to Grand Avenue between SR 101L and I-17, the roadway will probably have a capacity of approximately 50,000 vehicles per day (vpd), have some traffic signals, and appear to function more as a street than a freeway. This conclusion has an influence on the likely results of the Grand Avenue Northwest section.

EXISTING CONDITIONS

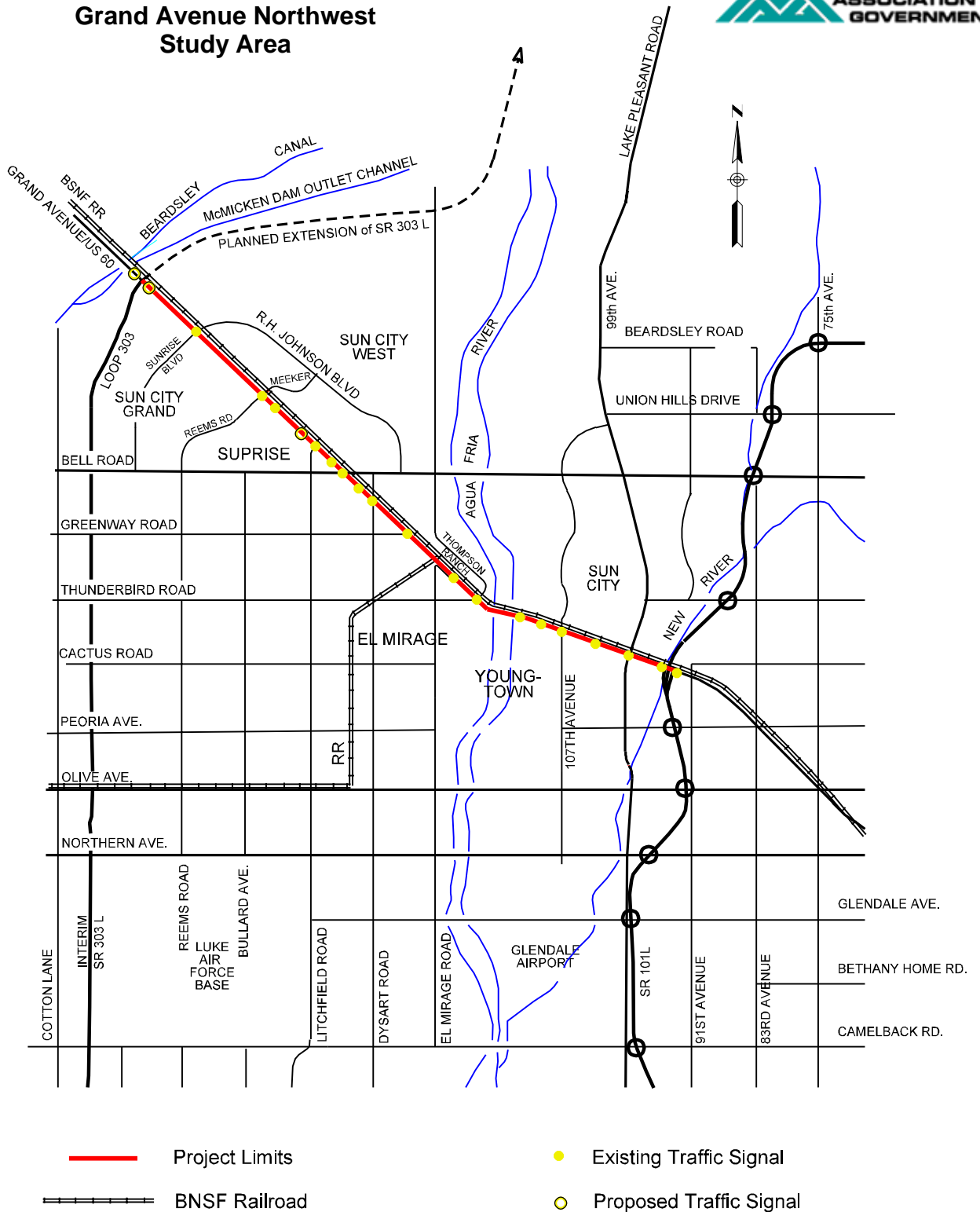
The general corridor area and project limits are illustrated in Exhibit ES.1. Grand Avenue is primarily a four-lane divided roadway with a short section of six-lane roadway near 103rd and 99th avenues. Between the Agua Fria River and the New River through Sun City, Grand Avenue has a raised curbed landscaped median. West of the Agua Fria River, Grand Avenue has an open swell median and paved outside shoulders. The right-of-way varies between 105 and 215 feet, and the roadway is not always in the center of the right-of-way.

There are 18 signalized intersections and three more planned in the 11.5-mile length between SR 303L and SR 101L (average is one every 0.6 miles). In addition, there are nine additional unsignalized intersections. The BNSF parallels Grand Avenue on the northeast side. All cross streets cross the railroad at grade. There is a high degree of access control along Grand Avenue due to the railroad, a frontage road in El Mirage, and the way most of the development has been designed. There are commercial driveways along Grand Avenue in Sun City and north of Bell Road. The roadway functions as a high-type arterial due to the access control and the use of paved shoulders without curbs in most areas.

The existing typical weekday traffic volumes range from 14,000 vpd near SR 303L up to 37,400 vpd at 107th Avenue. Over the past two decades, traffic volumes have not grown dramatically due to diversions of traffic to I-10, SR 74 and the interim SR 303L. However, more recently, volumes have begun to increase more rapidly due to the development and the completion of SR 101L in the fall of 2000.

Overall, the accident rate along Grand Avenue is low compared to urban arterials; however, the fatality rate is higher than average due to the mix of through and local urban traffic.

Exhibit ES.1 Grand Avenue Northwest Study Area



Grand Avenue from Bell Road southeastward is designed as a SMART corridor in the MAG ITS Strategic Plan and will receive installation of intelligent transportation systems (ITS) systems including signal intertie, traffic detection, cameras, variable message signs, and linkage to a traffic operations center.

The only sidewalks along Grand Avenue are limited to a few commercial frontage areas. Due to the wide combined highway/railroad corridor, pedestrians do not frequently cross Grand Avenue. Bicycles are permitted on Grand Avenue, but there are no signs or pavement markings designating bicycle usage.

The local bus system is limited to Route 106 which ends at Boswell Hospital and extends into Phoenix via Peoria Avenue. Phoenix-Las Vegas intercity buses stop in Youngtown. There are three dial-a-ride systems that cover most of the corridor area.

BNSF operates a single branch line adjacent to Grand Avenue and an automobile intermodal yard in El Mirage. Trains usually pass through the area traveling at approximately 40 mph. A spur track crosses Grand Avenue in El Mirage and serves Luke Air Force Base and other customers south of the corridor.

POPULATION AND EMPLOYMENT FORECASTS

For the purposes of estimating future traffic, a study area was identified bounded by SR 74 on the north, 67th Avenue on the east, Northern Avenue on the south, and Rooks Road on the west. MAG has adopted growth forecasts that were prepared in 1997. The rate of growth in the area and the changes in the general plans of some of the communities indicated that some updating of these forecasts was needed and was accomplished as part of this study. Working with MAG staff and the local communities, alternative growth forecasts were developed which indicated that by 2025, the growth in the study area may be approximately 90,000 more than is in the currently adopted forecasts. A comparison of the estimated 2000, MAG adopted, and the revised forecasts developed for this study are summarized below.

Comparison of Socioeconomic Projections Grand Avenue Northwest Corridor Area of Influence

Projections	Population	Employment
2000 MAG Adopted	223,000	45,000
2025 MAG Design	437,000	120,000
2025 Alternative Higher Growth	526,000	167,000

Both 2025 forecasts were input into the MAG regional travel forecasting model and used as a basis for determining needs and evaluating potential improvements in the corridor. An update of the adopted MAG forecasts is expected later in 2002.

ENVIRONMENTAL ISSUES AND TITLE VI/ENVIRONMENTAL JUSTICE

A brief environmental overview was made of the corridor to determine if there are any “fatal flaw” issues. None were found. The corridor does have a high percentage of populations that are protected under Title VI. Further evaluation will be required if the design of any improvements will directly impact employment or residential areas.

KEY ISSUES OF THE CORRIDOR STUDY

Based upon input from the agency/community forum and first public meeting, the following key issues were identified for the corridor:

- Improve crossings of Grand Avenue and the railroad.
- Improve emergency vehicle access within the corridor.
- Improve traffic operations at intersections.
- Expedite travel along Grand Avenue.
- Minimize environmental impacts including noise, visual and air pollution.
- Improve aesthetics of the corridor.
- Identify opportunities to enhance street network continuity to improve regional mobility.
- Maintain and enhance system continuity on Grand.
- Improve safety within the corridor.
- Address access control policies for Grand Avenue.
- Enhance elderly mobility.
- Enhance alternative mode travel within the corridor.
- Develop strategies that seek to improve both rail and vehicular traffic within the corridor.

LONG-TERM ROADWAY NEEDS

Transportation needs were identified through consultation with the public and agency stakeholders as well as through analyses and field review by the project team.

Traffic forecasts indicate that by 2010 the typical weekday traffic volumes will range from 25,900 vpd on the west end to 44,900 vpd on the east end. By 2025, the daily volumes are forecast to range between 40,800 and 57,100 vpd. Without improvements to Grand Avenue, all the major intersections are expected to be heavily congested by 2025. Widening Grand Avenue to six lanes and adding some turn lanes at intersections will enable most of the intersections to operate satisfactorily at Level of Service D in the peak hours.

There is interest from the communities to provide grade separations with the railroad to serve the two major hospitals in the area. This desire is based upon concern that the presence of a train on the tracks could delay getting to the hospitals in emergency situations. To date there are no documented cases of loss of life or other consequences caused by train delays.

There is also concern about the safety and appearance of the drainage channel along the south side of Grand Avenue east of Bell Road. The absence of landscaping and lighting along the roadway are also considered needs in the corridor.

Signal timing and the absence of modern traffic control and ITS is also a concern.

The absence of continuous arterial streets in the general study area is a major long-term concern. Grand Avenue and Bell Road carry most of the arterial traffic and cannot be expected to absorb the additional traffic volumes created by more development in the area.

ALTERNATIVE MODES NEEDS

Issues related to transit, pedestrians, bicyclists, and electric carts were identified through input from the public and stakeholders, through research provided in prior studies, and through field review. Transit service in the area is currently limited to separate dial-a-ride systems operated in each community. The metropolitan bus service has very limited service in the area because there is no funding provided by the local communities for this service.

The principal need is to develop a transit funding source that ideally would span throughout the corridor to provide coordinated transit service. Bus stops and park-and-ride lots will be needed to support the expanded system.

There are no provisions for pedestrians along Grand Avenue except in front of some commercial areas. Crossing Grand Avenue and the railroad is also very difficult due to the distance and the absence of designated walkways with smooth walking surfaces. Throughout the area, there are limited pathways between communities, and no provisions have been made to link the communities to the planned recreation/non-motorized travel routes along the rivers as presented in the MAG West Valley Multi-Modal Transportation Plan and the Flood Control District of Maricopa County Agua Fria Watercourse Master Plan. Walkways are narrow and generally lack shade.

There are no separate bicycle facilities along Grand Avenue or in the corridor area. There are no plans to link the communities to the planned recreation/non-motorized travel routes along the rivers. Railroad crossings are rough and not designed for bicyclists.

Electric carts are used within communities, but there are no provisions for travel between the communities. Standards for and application of signage and markings for cart travel are inconsistent and unevenly applied.

OPTIONS FOR IMPROVEMENTS IN THE CORRIDOR

Over 60 optional actions were identified and evaluated. These options covered a wide range of possibilities for roadway improvements as well as transit, pedestrian, bicyclists, and electric cart. The full list of options is included in Chapter 8 of the Final Report.

The first decision that was made was the type of basic roadway improvements for Grand Avenue. Three basic alternatives were identified and evaluated. The No-Build option and the Full Expressway option were not recommended for the following reasons:

- **No Build Option:** Traffic congestion will get increasingly worse, and the accident rate will continue to be high. The communities clearly want improvements to be made.
- **Fully-Controlled Access Expressway:** This option would entail removal of most traffic signals along Grand Avenue, construction of grade-separated interchanges at the major intersections and obtaining full access control. This option would require the removal of numerous business, extensive traffic rerouting, very high cost, higher traffic volumes and traffic speeds on Grand Avenue. This option was not favored by the communities and public and is not currently able to be funded. It was dropped from further consideration.

Some of the other specific actions that were identified and evaluated included grade separations at most of the individual intersections, grade separation with the railroad spur, removal of selected traffic signals, elimination of existing median breaks for left turns, and improvements to the railroad crossings.

Transit options considered included commuter rail, light rail, express bus, local bus, dial-a-ride, and park-and-ride lots. Other options included providing a pedestrian and bicycle path along Grand Avenue, improved pedestrian movement across the railroad and Grand Avenue, support for the regional non-motorized recreation and multi-modal transportation corridors, signage for the elderly, more pedestrian friendly walkways, and better provisions for electric cart travel.

These options were evaluated and from them, a set of recommendations was selected.

RECOMMENDATIONS

Grand Avenue has 18 existing traffic signals, and three more are planned, within the 11.5-mile section between SR 303L and SR 101L. Although it has a higher degree of access control than a typical arterial street, there are still many commercial driveways that provide business access along the corridor. Some stakeholders wish to maintain the future option of upgrading Grand Avenue to a fully access controlled expressway, to serve regional traffic needs. To accomplish this improvement would require elimination or substantial modifications to most existing commercial property with access to Grand, elimination of many traffic signals, removal of some homes and businesses along cross streets to construct grade separations, and other substantial improvements. In addition, pedestrians, bicycles, and local transit are typically prohibited on fully access controlled roadways. Given these impacts, particularly the loss of local access, other stakeholders are not in favor of upgrading this section of Grand Avenue to an expressway. Accordingly, the recommendations presented below were developed to address both regional traffic needs as well as local access. These two functions together determine the ultimate concept for this section of Grand Avenue as described below.

Grand Avenue is and will continue to be an enhanced arterial/limited expressway. It is a regional road that serves through traffic and arterial traffic. Most if not all traffic signals will remain, and the roadway will continue to have a higher degree of access control than typical arterials. The emphasis for Grand Avenue is the movement of motorized vehicles and, therefore, not on pedestrians, bicycles, or local transit if it hinders traffic flow.

The following recommendations were presented at an agency/community forum and at a public meeting. A questionnaire was given to all the attendees, and they were asked to rate their degree of support. All but one of the recommendations received support, and some of them received strong support. The second recommendation under Bicycle Improvements failed to receive overall support, as some people were concerned about the safety of bicyclists using the Grand Avenue shoulders under the “Share the Road” concept. ADOT cannot prohibit bicycle use of Grand Avenue, and there is insufficient right-of-way for a continuous, separate bicycle path. A recommendation was added to explore providing a bicycle path in the BNSF right-of-way. Additionally, two recommendations under “Basic Highway Features” were added in response to feedback from local agency representatives. The two additions address right-turn lanes and median openings.

Funding for these projects is expected to be a mix of private, local, regional, state, and federal sources. One potential funding source is a possible extension of the half-cent sales tax. Although the existing tax is limited to the construction of new freeways, the extension may be expected to allow sales tax funds to be applied to both new and existing facilities in the state highway system. A decision on funding allocations is expected to be made by the Regional Council following the MAG Regional Transportation Plan (RTP)

process, which is expected to be completed in 2003. Implementation of the recommendations presented below is contingent upon their consistency with and, as appropriate, their incorporation into the MAG RTP. Additional recommendations for Grand Avenue may be made as part of the MAG Northwest Transportation Study currently under way that will provide input to the MAG RTP process.

Basic Highway Features for Grand Avenue:

- Six lanes.
- Add turn lanes at intersections.
- ITS including signal coordination and traffic monitoring.
- Signal timing study.
- Evaluate railroad crossings for safety and Americans with Disabilities Act compliance.
- Landscaping.
- Street lighting.
- Prepare implementation plan for signage designed for elderly drivers based upon state and national research and coordinated with local jurisdictions.
- Place guardrail or barrier along drainage channel that is adjacent to travel lanes on Grand Avenue.
- Support construction of SR 303L and the arterial grid to divert traffic from Grand Avenue.
- *Add right-turn lanes to commercial areas where feasible.
- *Close median openings at non-signalized locations where feasible.

Transit Improvements:

- Encourage creation of a regional funding source, enabling implementation of a multi-jurisdictional transit system in the Northwest Valley.
- Develop an integrated Dial-A-Ride system covering Northwest Valley communities.
- Extend metropolitan transit system along arterials in corridor area in accordance with a master plan for bus service to be developed at a future date.
- Develop Park-and-Ride lots in accordance with MAG plan.
- If express bus service is extended into the corridor area, express buses can operate on Grand Avenue in mixed use travel lanes.
- Study innovative approaches to serving seniors and persons with disabilities.
- Monitor the MAG High Capacity Transit Study and the RPTA Regional Transit Study and their potential implications on the corridor area.
- With the emphasis on the movement of motorized vehicles on Grand Avenue, efforts should be made to avoid the creation of safety conflicts while considering transit needs.
- Bus stops on Grand should be restricted to locations with safe pedestrian access to and from adjacent communities. Stops should have bus bays where feasible and connect to pedestrian walkways from adjacent neighborhoods.

*Added in response to local agency feedback during consultation on the initial draft recommendations.

Pedestrian Improvements:

- With the emphasis on the movement of motorized vehicles on Grand Avenue, efforts should be made to avoid the creation of safety conflicts while considering pedestrian needs.
- If new grade separations are constructed along Grand Avenue, pedestrian travel across Grand should be considered in the design of the grade separations.
- All new street improvements should meet ADA requirements for pedestrian travel.
- Local governments should develop specific plans for connecting the residential areas to the regional trail systems being developed such as the West Valley non-motorized transportation and recreation corridor along the New River and Agua Fria River. These connections should not be along Grand Avenue.
- Within cities and neighborhoods away from Grand Avenue, local governments should look for ways to enhance pedestrian travel such as reducing length of crosswalks, separating sidewalks from the street curb, and providing shade for walkways.
- Local governments should revise land development standards to enhance pedestrian movements within activity centers.

Bicycle Improvements:

- With the emphasis on the movement of motorized vehicles on Grand Avenue, efforts should be made to avoid the creation of safety conflicts while considering bicycle needs.
- Bicycle movements along Grand Avenue may be accommodated on shoulders or wider outside travel lanes through the shared roadway concept in accordance with ADOT Policy MGT 02-1 dated March 1, 2002.
- *Explore options with BNSF to provide a bicycle path within their right-of-way.
- If new grade separations are constructed along Grand Avenue, bicycle travel across Grand should be considered in the design of the grade separations.
- Encourage the development of the West Valley non-motorized transportation and recreation corridor.
- Local governments should develop specific plans for connecting the residential areas to the regional trail systems being developed such as the West Valley non-motorized transportation and recreation corridor along the New River and Agua Fria River. Locations other than Grand Avenue should be emphasized.

Electric Cart Improvements:

- Consider the needs of cart travel in the design of new routes and grade separations.
- Local governments should conduct a follow-up specific study to develop recommendations for signage, lane markings, and site development standards to accommodate cart needs.
- Continue to limit golf carts to lower speed streets to minimize safety issues. Evaluate limiting carts to streets with speed limits less than 35 mph (current law permits carts on streets up to 35 mph).

Potential Grade Separations:

The following potential grade separations or interchanges have merit but need more detailed engineering, cost analyses, and impact assessment before a final decision is made to proceed. If constructed, each one would be expected to require the removal of existing businesses and in some cases residential units. The

*Added in response to local agency feedback during consultation on the initial draft recommendations.

design of all grade separations should consider alternative mode needs. Some traffic signals and access points along Grand Avenue that were placed to serve retail centers may have to be removed.

- Extension of El Mirage Road to Olive, with a grade separation interchange at Grand Avenue. Other locations farther west may also be considered. This proposed roadway would be part of the city/county road system and local governments should take the lead in implementation.
- Meeker/Reems grade separation interchange or emergency access grade separation. This facility would primarily benefit local community travel so local funding participation would be expected. There is high interest in this issue so that a study to select the best solution should be conducted soon.
- 103rd Avenue grade separation. This facility would provide a linkage between north and south Sun City for motorized and non-motorized travel. It would almost exclusively benefit local community travel so local funding would be expected.

PRIORITIES

Action elements of the recommendations are grouped into three priority categories as described below.

Priority One

The most important element of the recommendations for the Grand Avenue Northwest Corridor is to construct Grand Avenue as a six-lane roadway with a raised median. The proposed roadway cross section includes 10-foot outside shoulders where right-of-way is available. These shoulders would be available for use by bicyclists. To accomplish this action, ADOT will need to proceed with a Design Concept Report (DCR) and environmental documentation. Through this process, a signal timing study and railroad crossing evaluation can be conducted to determine what elements would be included in the overall design concept. In addition, the specific plans for the ITS Smart Corridor can be incorporated into the overall action plan and phasing plan for Grand Avenue. Through the DCR process, the determination of the intersection improvements will be made with consideration for non-motorized travelers and transit as appropriate. Similarly, the basic agreements between ADOT and local governments will be developed regarding landscaping and lighting. The concepts for providing a barrier along the drainage channel should also be incorporated. Final design and construction of these improvements will be dependent on identification of a funding source, programming the actions into the improvement program, and scheduling the implementation.

Studies should be conducted to determine the most appropriate action to provide emergency vehicle service across the railroad to the two major hospitals. The top priority is a grade separation for access to De E. Webb Hospital near Meeker/Reems intersection with Grand Avenue. Implementation of these items will be dependent on the solution chosen, identification and commitment of a funding source, and agency sponsorship.

The proposed El Mirage Road grade separation and extension southward and other potential options should be further evaluated in the Northwest Transportation Study.

In order to advance the development of the transit system in the area, a funding source must be identified. Ideally, this funding source would span across jurisdictional boundaries so that a unified system can be implemented. The local communities are urged to work toward this end.

The existing law limiting cart usage on streets with speed limits of 35 mph or less should be retained.

The above actions are recommended for completion in the near term depending on the availability of funding.

Priority Two

When the regional (or other) source for funding is identified, an integrated dial-a-ride system should be developed along with extension of the metropolitan bus system along the arterials. The park-and-ride lot slated for the general area of Bell Road and Grand Avenue should also be implemented.

The local communities should encourage and financially participate in the development of the non-motorized transportation and recreation corridors planned along the rivers and the connection of these corridors to the residential area. Connections should be provided for pedestrians and bicyclists.

Local governments should also follow up on studies and action plans for specific signage and marking needs designed specifically for the senior population and for the specific needs for carts.

Priority Three

As part of a more long-term program, grade separations at El Mirage and at 103rd Avenue have been suggested. Further studies should be conducted to help further define the concepts to be advanced at each location. Implementation of these grade separations will depend upon the availability of funding and the support and sponsorship of the local governments. The need for the grade separations should be further identified in the Northwest Area Transportation Study and updated periodically as future developments in the area become better defined.

Long-Term Needs

The Bell Road/Grand Avenue intersection will be improved as part of the Priority One basic highway improvements (additional lanes, no grade separation). As development continues and other improvements are made outside the corridor, the traffic at this intersection should be monitored to determine when or if additional improvements may be needed.

ESTIMATED COST

General cost estimates were made for some of the major recommended roadway improvements. The estimates include the cost of right-of-way and are based on unit cost in 2001. These estimates are very preliminary and may change substantially based on more detailed engineering and project development. Additional definition is needed for the transit, pedestrian, bicycle, and electric cart projects before reliable cost estimates can be made. Estimates of costs for transit and other alternative modes are expected as part of the MAG Northwest Area Transportation Study. Projects from this list or other projects from the list of recommendations above may be recommended for funding as part of the MAG RTP process.

Recommended Improvement	Cost (in millions)	Responsible Agency
Priority One		
• Widen Grand Avenue to six lanes	\$30	ADOT
• Add turn lanes on cross streets	\$9	Local Jurisdictions
• Intelligent transportation systems	\$2.5	ADOT/Regional/Local Jurisdictions
• Meeker/Reems grade separation interchange or Emergency-only grade separation	\$30	ADOT/Regional/Local Jurisdictions
	\$6	Local Jurisdictions/Private/Regional
Priority Three		
• El Mirage Road grade separation and extension	\$35	ADOT/Regional/Local Jurisdictions
• 103 rd Avenue grade separation	\$24	ADOT/Regional/Local Jurisdictions